

# EXHIBIT 11

1 UNITED STATES DISTRICT COURT

2 FOR THE WESTERN DISTRICT OF NEW YORK

3 -----  
4 **BLACK LOVE RESISTS IN THE RUST, et al.,**  
5 **individually and on behalf of a class of**  
6 **all others similarly situated,**

7 Plaintiffs,

8 -vs-

1:18-cv-00719-CCR

9 **CITY OF BUFFALO, N.Y., et al.,**

10 Defendants.  
11 -----

12 **ORAL EXAMINATION OF PHILIP SERAFINI**

13 **APPEARING REMOTELY FROM**

14 **ERIE COUNTY, NEW YORK**

15 Monday, December 27, 2021

16 9:03 a.m. - 5:15 p.m.

17 pursuant to notice  
18

19 **PAGES 324 & 325 DESIGNATED CONFIDENTIAL**  
20

21 REPORTED BY:

22 Carrie A. Fisher, Notary Public

23 APPEARING REMOTELY FROM ERIE COUNTY, NEW YORK

DEPAOLO CROSBY REPORTING SERVICES, INC.

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R E M O T E   A P P E A R A N C E S

APPEARING FOR THE PLAINTIFFS:

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—PHILIP SERAFINI - BY MS. EZIE - 12/27/21—

1 Q. And why was that important?

2 A. The Buffalo -- the BMHA wanted more police  
3 presence. When I say patrol, when I say the  
4 officers patrolled the housing properties,  
5 that was for more visibility in an effort to  
6 deter crime.

7 Q. What steps or strategies did the Housing Unit  
8 take to be highly visible?

9 MR. QUINN: Form.

10 A. They were in marked police cars and they drove  
11 through the housing properties, occasionally  
12 stopping, talking to residents and also  
13 attended community meetings within the housing  
14 projects -- housing properties.

15 Q. And is it accurate that within BMHA the  
16 Housing Unit concentrated its activities on a  
17 few main developments?

18 MR. QUINN: Form.

19 A. They were in charge -- or they patrolled all  
20 of the Housing properties. Some Housing  
21 properties demanded more attention, they're  
22 larger than others, some were small so it  
23 varied.

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—PHILIP SERAFINI - BY MS. EZIE - 12/27/21—

1 Q. Is it true that Kenfield-Langfield and Shaffer  
2 Village were BMHA properties that received  
3 special details or focus in the past?

4 A. Sometimes.

5 MR. QUINN: Form.

6 Q. I'm sorry. You may answer.

7 A. I said sometimes they did, yes.

8 Q. Okay. Why was that?

9 A. Kenfield-Langfield was the most heavily  
10 populated BMHA property, number one, and a lot  
11 of the crimes, some of the serious crimes that  
12 were committed on the properties were  
13 committed in those two properties.

14 Q. Okay. Kenfield-Langfield, that's a BMHA  
15 residence that's located on the east side of  
16 Buffalo, correct?

17 A. That's correct.

18 Q. And most of Kenfield-Langfield's residences  
19 are -- residents are Black or Latino?

20 A. I don't know the makeup of all the residents.

21 Q. Is it fair to say there is a large population  
22 of Black and Latino residents at that BMHA  
23 property?

—DEPAOLO CROSBY REPORTING SERVICES, INC.—

—PHILIP SERAFINI - BY MS. EZIE - 12/27/21—

1 of the vehicles on days. That was under his  
2 purview so that's why I forwarded it to him.

3 Q. Got it. Now, isn't it -- is it true that  
4 through issuing summonses and impounds the  
5 officers you worked for did generate  
6 increasing revenue for the City and, for  
7 instance, the bureau of parking?

8 MR. QUINN: Form.

9 A. That's correct, yes.

10 Q. Okay. Do you know how that increased revenue  
11 was used?

12 MR. QUINN: Form.

13 A. I have no idea.

14 Q. Do you know whether the increases to your  
15 production helped make the case for overtime  
16 for Strike Force officers?

17 MR. QUINN: Form.

18 A. I don't know specifically, no.

19 Q. Do you consider -- did you consider overtime  
20 to be a reward for good work performed by your  
21 officers?

22 MR. QUINN: Form.

23 A. Did I consider it to be a reward? No.

—DEPAOLO CROSBY REPORTING SERVICES, INC.—